

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

KENNETH FITCH and
ESTATE OF DIANNE L. FITCH

Plaintiffs,

V.

FEDERAL HOUSING FINANCE
AGENCY, FEDERAL NATIONAL
MORTGAGE ASSOCIATION,
WELLS FARGO BANK, N.A.,
HARMON LAW OFFICES, P.C., and
266 PUTNAM AVENUE, LLC

Defendants.

Civil Action No. 1:18-cv-00214

**DEFENDANT 266 PUTNAM AVENUE, LLC'S OPPOSITION TO
PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

Defendant 266 Putnam Avenue, LLC ("Putnam") hereby opposes Plaintiffs' Motion for Summary Judgment (the "Motion"). *See* Dkt. No. 160. Putnam opposes Plaintiffs' Motion on the same grounds set forth in its previously filed Motions for Partial Summary Judgment and related filings, *see* Docket Nos. 96, 117, 167, 168, 169, which are incorporated herein by reference. For the reasons set forth therein, Plaintiffs' Motion should be denied.

266 PUTNAM AVENUE, LLC
By its attorneys,

/s/ Zachary W. Berk
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DATED: December 1, 2021

CERTIFICATE OF SERVICE

I, Zachary W. Berk, counsel for Defendant 266 PUTNAM AVENUE, LLC, hereby certify that I served a true copy of the within document upon all counsel of record through the Court's electronic filing system.

12/1/2021

Date

/s/ Zachary W. Berk

Zachary W. Berk